

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Russell Kauffman**

**Debtor(s)**

**Deutsche Bank National Trust Company, as  
Indenture Trustee, for New Century Home Equity  
Loan Trust 2005-2**

**Movant**

**vs.**

**Russell Kauffman**

**Respondent(s)**

**BK NO. 24-13538 AMC**

**Chapter 13**

**Hearing Date: not yet set**

**OBJECTION OF DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
INDENTURE TRUSTEE, FOR NEW CENTURY HOME EQUITY LOAN TRUST 2005-2  
TO CONFIRMATION OF CHAPTER 13 PLAN**

Deutsche Bank National Trust Company, as Indenture Trustee, for New Century Home Equity Loan Trust 2005-2 (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On or before the Bar Date Secured Creditor will file a secured proof of claim setting forth an estimated pre-petition arrears in the amount of \$65,676.46.
2. Debtor's Plan provides for payment in the amount of \$62,963.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$2,713.46, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, Deutsche Bank National Trust Company, as Indenture Trustee, for New Century Home Equity Loan Trust 2005-2, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: October 25, 2024

By: /s/ Denise Carlon  
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